

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

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BSD Management LLC,

Plaintiff,

Case No.: 2:22-cv-11763

- against -

Hon. Stephen J. Murphy, III
U.S.D.J.

Eran Rozen, Mr. Frost Inc., Salpai Inc., and Bellas
& Wachowski,

NOTICE OF MOTION

Defendants.

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PLEASE TAKE NOTICE that upon the annexed Memorandum of Law dated November 23, 2022, together with the supporting together with the Declaration of Joshua Levin-Epstein, Esq. (the “Epstein Decl.”), and the exhibits annexed thereto, and the Affidavit of Eran Rozen (the “Rozen Aff.”), Defendants Eran Rozen (“Rozen ”), Mr. Frost Inc. (“Mr. Frost”) and Salpai Inc. (“Salpai”, and together with Rozen and Mr. Frost, collectively, the “Defendants”), by and through the undersigned counsel, will move this Court, the Honorable District Judge Stephen J. Murphy, III presiding, for an order: (i) vacating the Clerk’s entries of default entered on August 16, 2022 [Dckt. No. 5] and October 31, 2022 [Dckt. Nos. 25, 26] pursuant to Federal Rules of Civil Procedure (“Fed.R.Civ.P.”) 55(c), 60(b)(1) and 60(b)(4) (the “Motion to Vacate”) (ii) for such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that answering papers, if any, must be served on or before November 29, 2022, and Defendants’ reply must be served on or before December 6, 2022.

Dated: New York, New York
November 23, 2022

Respectfully Submitted,

LEVIN EPSTEIN & ASSOCIATES, P.C.

/s/ Joshua Levin-Epstein, Esq.

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*Attorneys for Defendants Eran Rozen, Mr.
Frost Inc., and Salpai Inc*

Cc: All parties via ECF